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Pacific West Management, LLC and
William D. Pennington*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CRYSTAL BUCHSPICS,

Plaintiff,

vs.

PACIFIC WEST MANAGEMENT, LLC AND
WILLIAM D. PENNINGTON,

Defendants.

Case No. 3:24-cv-00095-MMD-CSD

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS TO
FILE A RESPONSE TO PLAINTIFF'S
FIRST AMENDED COMPLAINT**

(FIRST REQUEST)

Defendants Pacific West Management, LLC and William D. Pennington, by and through their counsel, the law firm of Jackson Lewis P.C., and Plaintiff Crystal Buchspics, by and through her counsel, the Law Office of Mark Mausert, hereby stipulate and agree to extend the deadline for Defendants to file their respective responses to Plaintiff's First Amended Complaint from **May 6, 2024**, to **May 13, 2024**. This Stipulation is submitted and based upon the following:

1. On February 27, 2024, Plaintiff filed a Complaint naming Pacific West Management, LLC and William D. Pennington as Defendants.

2. On March 1, 2024, Plaintiff served Pacific West Management, LLC with a copy of the Summons and Complaint. The deadline for Pacific West Management, LLC to respond to Plaintiff's Complaint is March 22, 2024.

3. On March 15, 2024, Plaintiff served Mr. Pennington with a copy of the Summons and Complaint. The deadline for Mr. Pennington to respond to Plaintiff's Complaint is April 5, 2024.

4. On April 15, 2024, Plaintiff filed a First Amended Complaint. Defendants' deadline to respond to the First Amended Complaint is May 6, 2024.

5. Defendants' counsel was out of the office with a respiratory illness last week and requires additional time to investigate Plaintiff's allegations and prepare Defendants' respective responses.

6. This is the first request for an extension of time for Defendants to file a response to Plaintiff's First Amended Complaint. The parties agree to extend the deadline for both Defendants to file a responsive pleading to Plaintiff's Complaint to **May 13, 2024**.

7. This request is made in good faith and not for the purpose of delay.

8. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation and Order shall be construed as an admission of or consent to the merit or validity of any claim, defense, objection, or right by any party in this case.

DATED this 6th day of May, 2024.

LAW OFFICE OF MARK MAUSER

JACKSON LEWIS P.C.

/s/ Sean McDowell
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ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

Dated: May 7, 2024